

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. CR 20-14-D
)	
TARENCE D. McLANE)	
and JEREMIAH D. BOUZIDEN,)	
)	
Defendants.)	

JOINT UNOPPOSED MOTION TO CONTINUE JURY TRIAL SETTING

Defendants, Tarence D. McLane and Jeremiah D. Bouziden, move to continue the trial of this matter from the March 10, 2020 trial docket to the April 2020 trial docket. As grounds for this request, Defendants show the following, in compliance with LcrR 12.1(e).

1. Defendants were indicted by the grand jury on January 21, 2019. (Doc. 24) Defendant Bouziden was arraigned on the grand jury indictment on January 28, 2020. (Doc. 26) Defendant McLane was arraigned on the grand jury indictment on February 3, 2020. (Doc. 28) At a combined preliminary hearing/detention hearing held on December 23, 2019, both Defendants were ordered detained pending trial. (Docs. 19, 21)

2. It is not believed that this case will go to trial. Counsel for the Defendants are in plea discussions with the government. It is not believed that these discussions will be

concluded before the March 10, 2020 trial date. Counsel for Defendants submit that the ends of justice, the assurance of due process and equal protection, and Defendants' Sixth Amendment right to the effective assistance of counsel, are served by continuing this matter to the April 2020 trial docket. The ends of justice in granting this motion for continuance outweigh the interests of the public and the Defendants in a speedy trial.

3. No previous motion for continuance has been filed.

4. Associated counsel cannot handle Mr. McLane's and Mr. Bouziden's cases because the undersigned are their only lawyers.

5. This motion for continuance is not being made due to the complexity of the case, or because the motion requires divulging trial strategy or information of a highly personal nature. However, this motion is being made in order to complete plea negotiations.

6. Counsel for Mr. McLane and Mr. Bouziden have consulted with Thomas B. Snyder, AUSA, regarding this motion to continue the trial date. The government does not object. If required, Defendants will execute waivers of speedy trial.

7. The requested continuance of the trial date will impact the trial date currently set in this case.

WHEREFORE, in light of the foregoing reasons, Defendants request that the trial date in his case be continued to the April 2020 docket.

Respectfully submitted,

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Lawyer for Defendant,
Jeremiah D. Bouziden

Certificate of Electronic Service and Filing

This is to certify that on this 20th day of February, 2020, I caused the foregoing instrument to be filed with the Clerk of the Court using the ECF System for filing, with electronic service to be made via CM/ECF to Thomas B. Snyder, AUSA, and to all counsel of record. To counsel's knowledge, there are no non-ECF registrants who are counsel in this case.

/s/ David Autry

/s/ Richard W. Anderson